

summarily concludes that it would have been obvious to one of ordinary skill in the art to combine Rienhoff with Kim in order to "restrict access to secure content". These assertions are incorrect for at least the following reasons.

The conclusary statement that one of ordinary skill in the art would have been motivated to combine the alleged teachings of Rienhoff with the Kim system in order to restrict access to secure content fails to recognize that Kim already restricts access to secure content. Thus, one of ordinary skill in the art would not have been motivated to combine the alleged teachings of Rienhoff with Kim as asserted by the Office Action.

Further, contrary to the assertion of the Office Action, Rienhoff does not teach, nor can it reasonably be considered to have suggested, the relied upon features. For example, the allegedly corresponding e-mail in Rienhoff may direct a user to a secure area of a website, but "access" to the secured area of the website is only gained by logging on with, for example, the log-in name and password established in step 750 (see paragraphs [0106] and [0113] of Rienhoff). Thus, the allegedly corresponding e-mail in Rienhoff does not provide a recipient who does not have access to the workflow system with an access to an associated process of the workflow system, as recited, for example in claim 1.

There is no corresponding "workflow system" in Rienhoff to which a user does not have access prior to receipt of an e-mail, and which the user is provided access to the associated process of the workflow system by a link in the e-mail. In other words, prior to receiving the e-mail, the user in Rienhoff has access to the server, and access to the secured area of the website is only gained after logging in with log in name and password.

Thus, merely combining the teaching of Rienhoff, to direct registered users to a secure area of a website, which the user must then log on to, for example, in step 780, with the e-mails in Kim, which are directed to authenticated users, would not have rendered obvious the features of the pending claims.

With regard to claims 4, 5, 13 and 14, the Office Action asserts that Kim teaches randomly or pseudo-randomly generating the network address. This assertion is incorrect. Kim does not address the relevant network addresses being generated. The Office Action apparently relies on a section in Kim that deals with generating an electronic signature key as teaching the generation of network address. This assertion is incorrect. The generating of the electronic signature key described in Kim does not correspond to generating a network address.

Regarding claims 8, 9, 19 and 20, the Office Action concedes that Kim does not teach embedding multiple links within a single e-mail. The Office Action relies on Official Notice that is well known in the art that a plurality of links can be embedded in an e-mail for the purpose of sending multiple links without using multiple messages. However, as detailed in the July 13, 2006 Amendment, the November 8, 2006 personal interview with the Examiner, and the November 16 Amendment, such a modification of Kim would impermissibly alter Kim's method of operation and render it unsuitable for its intended purpose. Specifically, Kim teaches sending decision makers individual e-mails, specific to certain documents, with individual random keys. As such, careful control of the sequence of approval is achieved (see section 3.3 of Kim). Incorporating multiple links to various stages of the workflow process of Kim, with all of the corresponding random keys required by Kim, would defeat this purpose, rendering the invention of Kim unsuitable for its intended purpose.

The Office Action mischaracterizes the above argument by asserting, on pages 7, that Applicants argue that Kim is not capable of supporting such a feature. Applicants have not presented such an argument and have rejected this as the relevant standard. The Office Action asserts, with no reference to law or regulation, that because embedding a plurality of links "is not impossible within Kim's design," this somehow negates Applicants' argument that such a modification of Kim would impermissibly alter Kim's method of operation and

render it unsuitable for its intended purpose. The Office Action does not, therefore, rebut Applicants' arguments that a *prima facie* case for combining the references in the manner suggested has not been established.

Regarding claim 25, the Office Action asserts that Kim teaches excluding generating network addresses that have been embedded in previous e-mail messages created by the system that have not yet been accessed. The Office Action relies on page 2, second column, lines 25-40 of Kim as teaching such a feature. In the Response to Arguments section, the Office Action asserts that because Kim teaches that data within an e-mail, including the URL, can be encrypted to prevent it from being exposed, this means that the URL within each e-mail is "unique." This assertion is incorrect and does not address the relevant features of claim 25. For example, the fact that information may be encrypted for transmission, and decrypted for use, does not mean that URLs within each e-mail are unique. For example, if the same URL were sent to several users via encryption, even though each message might contain different encrypted data, the URL may be the same. Moreover, this does not correspond to excluding generated network addresses that have previously been embedded in any previous e-mail messages created by the system that have not yet been accessed. The feature of claim 25 allows for network addresses that have been accessed to be used again. There is no teaching or suggestion in the applied references of excluding generated network addresses that have previously been embedded in any previous e-mail messages created by the system that have not yet been accessed.

For at least the above reasons, the applied references do not teach, nor can they reasonably be considered to have suggested, the combination of features positively recited in independent claims 1, 10 and 21. Further, claims 2-9, 11-20, 22 and 25 are also neither taught, nor would they have been suggested, by the applied references for at least the